

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

AMENDED WITNESS AND EXHIBIT LIST
MAY 21, 2025 HEARINGS

Case No: 24-40605 24-40608 24-40610	Name of Debtor: Remarkable Healthcare of Carrollton LP Remarkable Healthcare of Dallas LP Remarkable Healthcare of Fort Worth LP
<u>WITNESSES:¹</u>	
1. Joshua Kilgore 2. Abraham Gutnicki 3. Liz Boydston 4. Max Schlan 5. Alexandr Rahn 6. John McPike 7. Laurie Beth McPike 8. Rebuttal experts. 9. Any witness designated by any other party 10. Any rebuttal witnesses as may be necessary	Judge: Brenda T. Rhoades
	Courtroom Deputy Clerk: Kayla Colasont
	Hearing Date / Time May 21, 2025 @ 10:00 a.m.
	Party's Name: KRS Seguin, et al.
	Attorney's Name: Jeff Carruth
	Attorney's Phone: 713-341-1158
	Attorney's email: jcarruth@wkpz.com
	Nature of Proceeding: See list below.
<u>List regarding Nature of the Proceeding:</u>	
1) Remarkable Healthcare of Carrollton, LP - 24-40605 - CH 7 (Alexandria Rahn) [518] City of Dallas' Motion For Distribution on It's Administrative Claim Filed by City of Dallas (Richards, James) [520] Application of for Administrative Expenses -- <i>Motion of KRS Landlords for Allowance of Administrative Rent and Disbursement of Registry Funds</i> --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Carrollton, LLC [521] Application of for Administrative Expenses -- <i>Motion of KRS Landlords to Disburse Registry Funds and/or Allow Administrative Expense Claim for Third and Fourth Payroll Funding</i> --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Carrollton, LLC [522] Motion to Withdraw Funds in the Amount of \$ 289,566.45 from Court Registry Filed by Remarkable Healthcare of Carrollton, LP, Remarkable Healthcare of Dallas, LP, Remarkable Healthcare of Fort Worth, LP [524] Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Carrollton, LLC [525] Motion of West Wharton County Hospital District for Distribution of Funds in the Court Registry Filed by West Wharton County Hospital District (Green, Debbie) (dc) Additional attachment(s) added on 4/24/2025 (dc).	

¹ Creditor reserves the right to amend and/or supplement this designation prior to the hearing(s), and to seek relief from the Court as might be necessary.

[526] Alleon Capital Partners, LLC's Motion For Turnover and Disbursement of Registry Funds Filed by Alleon Capital Partners, LLC (Klein, Buffey)
[535] Supplemental Motion for (I) Secured Claim Determination Pursuant to 11 U.S.C. §§ 105(a) and 506(a) and Federal Rule of Bankruptcy Procedure 3012, and (II) Declaratory Judgment Regarding Lack of Adequate Protection Pursuant to 28 U.S.C. §§ 220102 Filed by Alleon Capital Partners, LLC (Zavala, Thomas)

2) Remarkable Healthcare of Dallas, LP - 24-40608 - CH 7 (Alexandria Rahn)

[128] Application of for Administrative Expenses --*Motion of KRS Landlords for Allowance of Administrative Rent and Disbursement of Registry Funds* --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Dallas, LLC
[129] Application of for Administrative Expenses -- *Motion of KRS Landlords to Disburse Registry Funds and/or Allow Administrative Expense Claim for Third and Fourth Payroll Funding* --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Dallas, LLC
[130] Motion to Withdraw Funds in the Amount of \$ 289,566.45 from Court Registry Filed by Remarkable Healthcare of Dallas, LP
[132] Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Dallas, LLC
[133] Alleon Capital Partners, LLC'S Motion For Turnover and Disbursement of Registry Funds Filed by Alleon Capital Partners, LLC
[139] Supplemental Motion for (I) Secured Claim Determination Pursuant to 11 U.S.C. §§ 105(a) and 506(a) and Federal Rule of Bankruptcy Procedure 3012, and (II) Declaratory Judgment Regarding Lack of Adequate Protection Pursuant to 28 U.S.C. §§ 220102 Filed by Alleon Capital Partners, LLC (Zavala, Thomas)

3) Remarkable Healthcare of Fort Worth, LP - 24-40610 - CH 7 (Alexandria Rahn)

[127] Application of for Administrative Expenses -- *Motion of KRS Landlords for Allowance of Administrative Rent and Disbursement of Registry Funds* --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Fort Worth, LLC
[128] Application of for Administrative Expenses -- *Motion of KRS Landlords to Disburse Registry Funds and/or Allow Administrative Expense Claim for Third and Fourth Payroll Funding* --, Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Fort Worth, LLC
[129] Motion to Withdraw Funds in the Amount of \$ 289,566.45 from Court Registry Filed by Remarkable Healthcare of Fort Worth, LP
[131] Motion to Withdraw Funds in the Amount of \$ from Court Registry Filed by KRS Fort Worth, LLC
[132] ALLEON CAPITAL PARTNERS, LLC'S MOTION FOR TURNOVER AND DISBURSEMENT OF REGISTRY FUNDS Filed by Alleon Capital Partners, LLC
[138] Supplemental Motion for (I) Secured Claim Determination Pursuant to 11 U.S.C. §§ 105(a) and 506(a) and Federal Rule of Bankruptcy Procedure 3012, and (II) Declaratory Judgment Regarding Lack of Adequate Protection Pursuant to 28 U.S.C. §§ 220102 Filed by Alleon Capital Partners, LLC (Zavala, Thomas)

4) Remarkable Healthcare, LLC and Remarkable Healthcare of Seguin, LP - 24-40611 - CH 11 (Alexandria Rahn)

[248] Application of for Administrative Expenses *Motion of Landlord for Allowance and Payment of Administrative Rent Related to Remarkable Healthcare of Seguin, LP Facility* Filed by KRS Seguin, LLC, Kilgore Property Management LLC
[250] Application for Compensation and Reimbursement of Expenses *MOTION FOR ADMINISTRATIVE CLAIM AND SECOND AND FINAL FEE APPLICATION OF GUTNICKI LLP FOR PAYMENT OF FEES AND EXPENSES* for Elizabeth Nicolle Boydston, Debtor's Attorney, Fee: \$586,798.02, Expenses: \$22,621.62. Filed by Elizabeth Nicolle Boydston

EXHIBITS

SEE ATTACHED LIST

KRS-xx Exhibits -- Remarkable Ch. 33 / 2024-2025				
EXH## K ____	Description	Offer	Object	Admit
1	4/3/24 Letter from CMS to Remarkable Health Care			
23	Proof of claim recap updated 20240709			
24	Proof of claim KRS-C			
25	Proof of claim KRS-D			
26	Proof of claim KRS-FW			
27	Proof of claim KRS-S			
30	KRS-C lease			
31	KRS-D lease			
32	KRS-FW lease			
33	KRS-S lease			
34	KRS and related payroll funding recap			
129	DIP Payroll Note 001 - signed			
130	DIP Payroll Note 002 - signed			
131	Final Order Granting [69]			
132	Final Order Granting [70]			
136	Admin. Claim Order DFW DE 0156			
157	Debtor plan 005 - projections (Docket No. 0180)			
158	Seguin admin rent			
	[reserved]			
	<i>Any items on the docket in any of the RH cases.</i>			
	<i>Any item designated by any other party.</i>			
	<i>Rebuttal exhibits as necessary.</i>			

C:\Users\Jeff Carruth\Downloads\[master exhibit list 20250521.0825.xlsx]exhlist20250521